

Responsible marketing and communication policy

Introduction	1
Scope of the Policy	2
Principles of responsible marketing and communication.....	3
Policy Monitoring and Review.....	9
Final provisions.....	9

Introduction

Allegro Group¹ pursues its ESG strategy to become a more sustainable organization where business development aligns with a strong organizational culture that values people and minimizes negative impacts on the natural environment.

In response to the increasing focus on communicating environmental impact, Allegro Group prepared a set of principles related to presenting ESG topics in external, as well as internal communication. The company's goal is to ensure that all relevant units within the Allegro Group, as well as their business partners involved in such communication, develop reliable, transparent, and credible marketing messages. Allegro Group strives for communication that is consistent with its mission and brand identity, meets high-quality standards, is truthfull and not misleading, and promotes continuous improvement in communicating our environmental efforts.

To support this objective, this Policy was inspired by legal regulations and recommendations concerning particularly environmental communication such as:

- Directive (EU) 2024/825 of the European Parliament and of the Council of 28 February 2024 amending Directives 2005/29/EC and 2011/83/EU as regards empowering consumers for the green transition through better protection against unfair practices and through better information: [Directive \(EU\) 2024/825](#),
- Guidelines developed by the Advertising Ethics Council regarding ethical communication and advertising in the context of environmental responsibility and sustainability ([The Advertising Code of Ethics](#)), as well as
- Guidance on the interpretation and application of Directive 2005/29/EC of the European Parliament and of the Council concerning unfair business-to-consumer commercial practices in the internal market: [Guidance on the interpretation and application of Directive 2005/29/EC](#).

¹ The term “Allegro Group” or “Allegro” refer to Allegro.eu and all its subsidiaries



Scope of the Policy

This policy covers all Allegro.eu and its subsidiaries (hereinafter referred to as “the Allegro Group”). Principles of responsible marketing and communication shall be enforced across all communication channels, including but not limited to:

External communication channels:

- Publications (including printed and online publications) to consumers, sales partners (merchants, brands etc), and business partners,
- Television, radio, outdoor advertising, digital campaigns, websites, product placement, ambient marketing and other marketing activities,
- Communication in Allegro ecosystem for partners (merchants, brands etc.) and consumers,
- PR, corporate and commercial channels,
- Social media,
- Company events and participation in trade fairs and conferences,
- Sponsorship and collaboration with influencers,
- Employer branding and job descriptions, etc.

And internal communication such as:

- Newsletters, bulletins, information sheets,
- Team meetings and town halls,
- Internal training,
- Posters and other graphic materials,
- Internal branding initiatives,
- Intranet,
- Events, etc.

The Policy is intended to be followed by everyone involved in creating content and visuals/graphics related to Allegro's messaging, particularly employees and business partners creating such communications. Additionally, Allegro Group individuals are responsible for reviewing and ensuring that all received materials comply with internal procedures and standards including that policy. This responsibility is especially crucial when using AI tools. While AI can support communication efforts, it may at times generate inaccurate or misleading content leading to unintentional greenwashing. To mitigate this risk, Allegro maintains a firm commitment to human oversight. All AI-generated ESG communications must undergo thorough human review and validation before being shared externally.

Allegro.eu

Société anonyme

6, rue EugèneRuppert,
L-2453 Luxembourg,
GrandDuchy of
Luxembourg

Principles of responsible marketing and communication

The Allegro Group is guided by marketing and communication principles based on regulations and best market practices. The main principles to be followed include:

10 principles of responsible marketing and communication

1. Avoid **UNFAIR** commercial practices that violate social responsibility
2. Avoid **GENERIC CLAIMS** without concrete evidence
3. Base environmental communication on **FACTS AND DATA**
4. **DIFFERENTIATE** between specific product/action and company-level messaging
5. Avoid promoting **IRRELEVANT** benefits
6. Use **CLEAR** and understandable language
7. Use only **CREDIBLE** sustainability labelling
8. Ensure visuals are **ACCURATE** and reflect reality
9. Communicate **CONDITIONS AND LIMITATIONS** clearly
10. Use **CONSISTENT** and clear comparison methods



1. Avoid unfair commercial practices that could violate social responsibility

Ensure that marketing materials **are not considered unfair in all circumstances**, which includes, but is not limited to:

- **avoiding** content that is **contrary to the principles of social responsibility**, including violence, discrimination, stereotypes, substance abuse, promoting the consumption of tobacco products, drugs and other socially sensitive categories, promoting excessive consumption, or behaviours that pose a risk to health, social welfare and environment,
- **avoiding** communications that **manipulate consumers'** emotions or exploit psychological vulnerabilities,
- **providing clear** and **truthful information about pricing**, including all mandatory fees, charges, and applicable conditions, or
- ensuring that **all** marketing communications are **truthful, not misleading**, and **accurate in substance** and **presentation** etc.

A list of the prohibited commercial practices which are in all circumstances considered unfair is available in [Annex I DIRECTIVE 2005/29/EC](#). We note that this list is open-ended and each case of infringement is assessed individually. According to the applicable regulations, unfair commercial

Allegro.eu

Société anonyme

6, rue EugèneRuppert,
L-2453 Luxembourg,
GrandDuchy of
Luxembourg

practices are those which are contrary to the requirements of professional diligence and are likely to materially distort the purchasing behaviour of the average consumer.

2. Avoid generic claims without evidence

Claims or statements about environmental or social characteristics², as well as circular economy (such as durability, repairability, or recyclability) should be **objective, measurable, and proven by evidence**. Vague or general statements may mislead recipients.

Examples of generic claims include “environmentally friendly”, “eco-friendly”, “green”, “nature’s friend”, “ecological”, “environmentally correct”, “climate friendly”, “gentle on the environment”, “carbon friendly”, “energy efficient³”, “biodegradable”, “biobased” or similar statements that suggest or create the impression of excellent environmental performance. These claims shall not be used unless they are supported by **recognised high environmental performance, confirmed by certification, an official labelling system or other reliable sources**.

Additionally, claims such as “conscious,” “sustainable,” or “responsible” should not be based exclusively on environmental performance, as such claims also relate to other characteristics, including social aspects.

*For instance, the claim “**climate-friendly packaging**” would be a generic claim, unsupported by data, whilst claiming that “**100 % of energy used to produce this packaging** comes from renewable sources based on guarantees of origins” would be a specific claim, which would not fall under this prohibition. Additionally, any claim concerning renewable energy should be substantiated by official Guarantees of Origins issued by local authorities.*



3. Base environmental communication on facts and data

Making an **environmental claim** related to **future environmental performance** (e.g. carbon or climate neutrality) should be supported by **clear, objective, publicly available** and **verifiable commitments** set out in a detailed and realistic implementation plan (e.g. decarbonization or transition) that includes measurable and time-bound targets. Such claims should undergo regular

² Information provided on the social characteristics of a product throughout its value chain can relate, for example, to the quality and fairness of working conditions of the workforce involved, such as adequate wages, social protection, the safety of the work environment and social dialogue, respect for human rights, to equal treatment and opportunities for all, including gender equality, inclusion and diversity, to contributions to social initiatives or to ethical commitments, such as animal welfare etc. (Art. 3 [Directive \(EU\) 2024/825](#))

³ Claim ‘energy efficient’ could be made based on recognised excellent environmental performance in accordance with Regulation (EU) 2017/1369 (Art. 10 [Directive \(EU\) 2024/825](#))

verification by an independent third-party expert, with the results transparently disclosed to consumers.

Do not use claims of climate neutrality **based solely on CO₂ offsetting** as they mislead consumers and give the false impression that the usage of a product or service does not have an environmental impact. Examples of such claims are “climate neutral”, “CO₂ neutral certified”, “carbon positive”, “climate net-zero”, “climate compensated”, “reduced climate impact” and “limited CO₂ footprint”. Such claims should only be allowed when they are based on the actual lifecycle impact, **not based on the offsetting** of greenhouse gas emissions.

Clear explanations of claims related to specific commitments should be **provided to consumers** through channels such as FAQs, the website, or press releases. These clarifications must be **easily accessible** at the point where the claim appears - for example, via a hyperlink, tooltip, or similar solution. In case of a marketing communication the clear explanation of specific should be explained through the entire consumer’s path.

*Pay **special attention** while using claims such as: “climate neutral”, “CO₂ neutral certified”, “carbon positive”, “climate net zero”, “climate compensated”, “reduced climate impact” and “limited CO₂ footprint”. Such statements should be used exclusively when **supported by objective and verifiable commitments**.*



4. Differentiate between specific product/action and company-level messaging

Do not exaggerate environmental benefits or attribute them to characteristics that are common to all products in a given category, or **unjustifiably extend** a positive environmental message to the entire company if it only applies to a specific product or initiative. Messages about the environmental impact of a particular product or action should be clearly separated from communication about the company’s sustainability policies or practices – channels of **communication should be tailored to the scale of the project**.

*A small implementation, for example a local pilot in one location should not be presented as a main characteristic. Slogans such as for example “green vehicle fleet” are misleading if they do not take into account the scale of the company’s operations or the entire journey. Only features that are **widely available and reliably implemented** can be considered as true differentiators of the service or company.*



5. Avoid promoting irrelevant benefits

Allegro.eu

Société anonyme

6, rue EugèneRuppert,
L-2453 Luxembourg,
GrandDuchy of
Luxembourg

Do not advertise benefits that are irrelevant and not directly related to any feature of a specific product or business. Such information can mislead consumers by **implying** a competitive or environmental **advantage that does not exist**, for example, claiming that a particular brand of bottled water is gluten-free or claiming that paper sheets do not contain plastic.

*Referencing support or sponsorships for sports clubs, with the narrative that the company actively reinforces social issues, may be misleading if it has **no real connection to the environmental or social impact** of core business. Such claims can distract from more material issues related to the company's operations, like packaging waste, delivery emissions, or product sourcing..*

6. Use clear and understandable language

Create messages that are **clear, easy to understand**, and use **transparent language**, taking into account the **social, cultural, and linguistic context** of the market to ensure transparency and avoid hiding potentially inconvenient information behind technical or academic language. Scientific or environmental terminology is acceptable only if **necessary and understandable** to the average consumer.

*"Our packaging is made from materials compliant with **ISO 14024**" □ The technical term is unclear to the average consumer and does not meet the requirement of transparency.*



7. Use only credible sustainability labelling

Sustainability labelling may relate to many features of a product, process, or business activity, and it is important to ensure that such **labelling is clear and credible**. Labels not based on a certification scheme or established by authorities⁴ should be avoided. Before applying sustainability labelling, ensure that it meets the minimum transparency and credibility requirements set out in publicly available certification system criteria, including objective monitoring of compliance with the system's requirements.

⁴ "certification scheme" means a third-party verification scheme that certifies that a product, process or business complies with certain requirements, that allows for the use of a corresponding sustainability label, and the terms of which, including its requirements, are publicly available and meets the criteria listed as amendments to Directive 2005/29/EC, Article 2, point (r), [DIRECTIVE \(EU\) 2024/825](#)

At Allegro Group, we strive to create a transparent and trustworthy marketplace. An integral part of our business is our Partners' commitment to ensuring full compliance with the law and acting in an honest manner. All offer content must be factually accurate and not misleading; this applies to all declarations, including those related to sustainability, certifications, and the environmental characteristics of products. Upon receiving a report, notification, or credible information indicating potential greenwashing or other breaches of honest environmental communication principles, **Allegro will take all reasonable and proportionate actions** — including removal of the listing or contacting the merchant — to prevent environmental misinformation and protect consumer interests.

*The claims based on internal assessments without transparent criteria or external monitoring such as "Our operations are **100% sustainable/carbon neutral**" **without any certification** or verification from an independent, credible body, e.g. Science Based Targets initiative or a public authority is prohibited. This kind of labeling is misleading because it **lacks credible evidence** and does not provide consumers with verifiable information about the company's environmental performance.*



8. Ensure visuals are accurate and reflect reality

Images and graphics must not be misleading and should not create **unjustified associations with eco-friendliness** — they should accurately reflect reality and align with the message. Therefore, **select visuals and backgrounds carefully** used in our communications — especially when using images (e.g., depicting trees, plants, forests, water, animals) and colours (e.g., blue or green backgrounds or text) that evoke associations with environmental sustainability.

*On the product page or banner, there is an image of a cardboard box with the logo surrounded by: **blooming plants, green leaves coming out of the package**, and captioned: "Your package – a **good choice for the planet**" □ Why it may be problematic?*

- *The graphic creates the impression that every shipment is environmentally friendly — which is not fully true (unless each one actually meets specific standards)*
- *There are no concrete details — is the packaging recycled? Reusable?*

9. Communicate conditions and limitations clearly

If a message relies on **specific conditions, assumptions, or disclaimers**, they must be clearly stated in the communication. In other words, if the environmental benefits refer only to **specific stages of the process** or **product's life cycle** (e.g., production, use, recycling), this must be **communicated clearly**.

*If packaging is advertised as for example “**compostable**” the company must make sure that consumers actually have access to industrial composting facilities. If such facilities **do not exist** in the country, then promoting the packaging as compostable is **misleading** and should not be done.*

*In such cases, the advertisement must **clearly explain** what “compostable” means, under what conditions the packaging breaks down, and where consumers can realistically dispose of it properly.*



10. Use consistent and clear comparison methods

While creating rankings or comparative advertising, specifically concerning environmental, social, or circular economy aspects (such as durability, repairability, or recyclability), it is essential to transparently disclose the comparison methodology and the sources of information used. Ensure that comparisons are **objective** and only **products** or **services** that satisfy **the same needs** or are intended for **the same purpose** should be compared.

*Avoid using claims such as “Product X is **greener than others**.” This statement **lacks a defined point of reference**, and the use of a vague term like “greener” without clarifying whether it refers to lower CO₂ emissions, reduced water usage, biodegradable packaging, or another environmental aspect makes the **message imprecise** and potentially misleading.*



Last but not least, consult in case of any communication concerning sustainability, environment or social issues

If you plan communication mentioning sustainability, environmental or social issues (in either narrative or visual form) **consult it** with the appropriate **internal experts** (e.g. Antitrust, PR, ESG, CSR, Legal, Compliance) **using the designated contact prasa@allegro.com** to ensure that all claims are fact-checked, compliant with regulations, and aligned with the company's

Allegro.eu

Société anonyme

6, rue EugèneRuppert,
L-2453 Luxembourg,
GrandDuchy of
Luxembourg



communication policy. The consultation should be conducted at least 7 business days before the publication deadline.

Policy Monitoring and Review

This Policy will be regularly reviewed and updated by the ESG team at least once every two years to ensure its relevance and effectiveness in line with the latest environmental communication trends and regulations. The Policy was approved by the Board of Directors. Each employee is responsible for implementing and applying the responsible marketing and communication policy, ensuring that our practices remain at the forefront of sustainability standards. In the event of a breach of this policy, immediate corrective actions will be taken to address the violation. If an employee or any other obligated person experiences or becomes aware of anything that violates the provisions of this Policy, they should immediately report this under the Whistleblowing Procedure.

Final provisions

Allegro Group will ensure that all of its employees and associates familiarise themselves with the Responsible marketing and communication policy and receive mandatory training on it at least once a year.

Last update: 2025-09-16

Allegro.eu

Société anonyme

6, rue EugèneRuppert,
L-2453 Luxembourg,
GrandDuchy of
Luxembourg